

WORK PLAN FOR SUPPLEMENTAL PCB CLEANUP ACTIVITIES
PROPOSED CONNECTOR ROAD
TSB Metals & Recycling, LLC
611 W. Wilbeth Road
Akron, Ohio

The objective of this Work Plan is to further assess the distribution of polychlorinated biphenyls (PCBs) in soils and to develop a cleanup plan in support of the proposed connector road at TSB Metals & Recycling, LLC (site). The proposed location of the connector road, which is shown on Figure 1, extends through a fenced area within which residual PCB contamination associated with an earlier soil cleanup by the prior owner is located. A preliminary grading design is shown on Figure 2. Soils within the fenced area at the Site are subject to the conditions of an earlier PCB cleanup, which are prescribed in a letter from United States Environmental Protection Agency (USEPA) to the prior owner's environmental consultant (Conestoga-Rovers & Associates, Inc. [CRA]) dated August 14, 2009. The historical analytical results for PCBs and total petroleum hydrocarbons (TPH)¹ in soil are shown on Figure 3.

The locations of 17 proposed soil borings are shown on Figure 4. Six soil borings will be advanced in areas where prior analytical results indicate the concentrations of PCBs is greater than 1 part per million (ppm), and the objective will be to characterize the vertical distribution of PCB contamination. Six additional soil borings will be advanced in outbound areas to characterize the potential horizontal distribution of PCBs in soils and in the eastern portion of the fenced area. Lastly, five soil borings will be advanced to evaluate the distribution of TPH contamination in the vicinity of the former Auto Prep Area.

The depths of the soil borings will vary from approximately 6 feet to 12 feet based on the proposed grade of the connector road. Soil samples from each exploration will be collected at one foot intervals. Boring logs will document the observed soil conditions, and each sample will be field screened for volatile organic compounds using a photoionization detection.

Initially, at least one soil sample from each exploration will be selected for laboratory analyses. In addition, multiple samples from deeper depths will be archived at the laboratory for possible analyses if additional analytical results are needed to characterize the vertical distribution of contamination. Select soil samples will be analyzed for PCBs by USEPA Method 8082 and/or TPH by USEPA Method 8015 (gasoline and diesel range organics).

The findings of the soil sampling will be summarized in a Soil Management and Disposal Plan, which will be submitted to USEPA for approval. The analytical results will be summarized in figures and tables, and details of the soil sampling activities, as well as analytical laboratory reports, will be appended to the Soil Management and Disposal Plan.

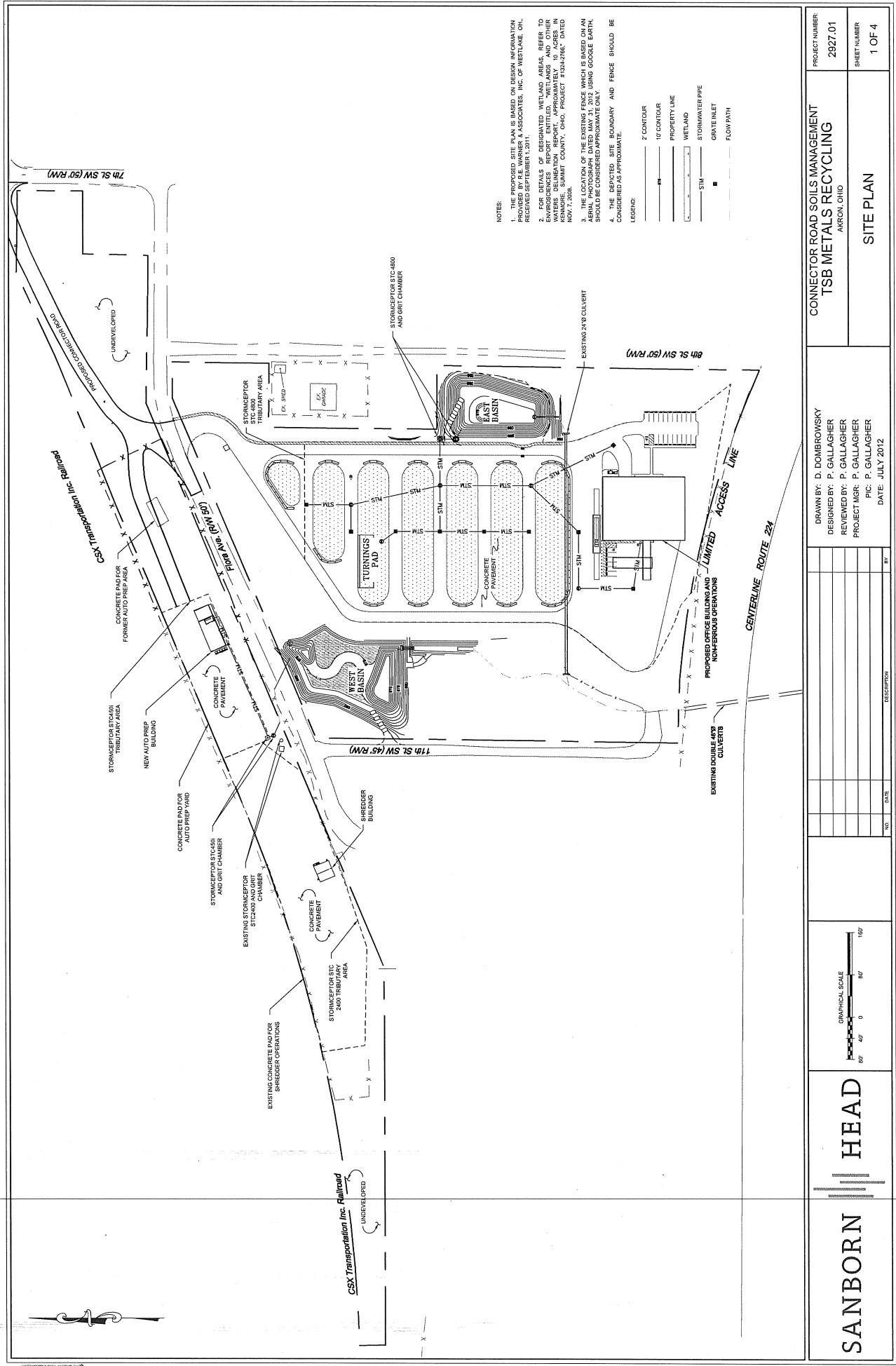
¹ During a prior investigation of the site, Sanborn, Head & Associates, Inc. observed petroleum stained soils in the vicinity of the former Auto Prep Area. One soil sample from nearby exploration B-283 was analyzed for TPH, and the laboratory result was greater than the saturation limit. Although TPH contamination is not subject to the conditions of the prior PCB cleanup, this Work Plan includes activities for TPH sampling because the sampling activities for PCBs and TPH will occur during the sample event.

The Soil Management and Disposal Plan will provide a brief narrative describing the rationale for how soils with PCB concentrations equal to or greater than 1 ppm will be managed and handled to support the construction of the connector road. In addition, the Soil Management and Disposal Plan will summarize the required modifications to the deed restriction, including the anticipated location of the modified fenced area.

Attachments:

- Figure 1 – Exploration Location Site Plan
- Figure 2 – Cut and Fill Amounts
- Figure 3 – Historical Analytical Results for Soil Samples
- Figure 4 – Pre-Excavation Soil Sampling

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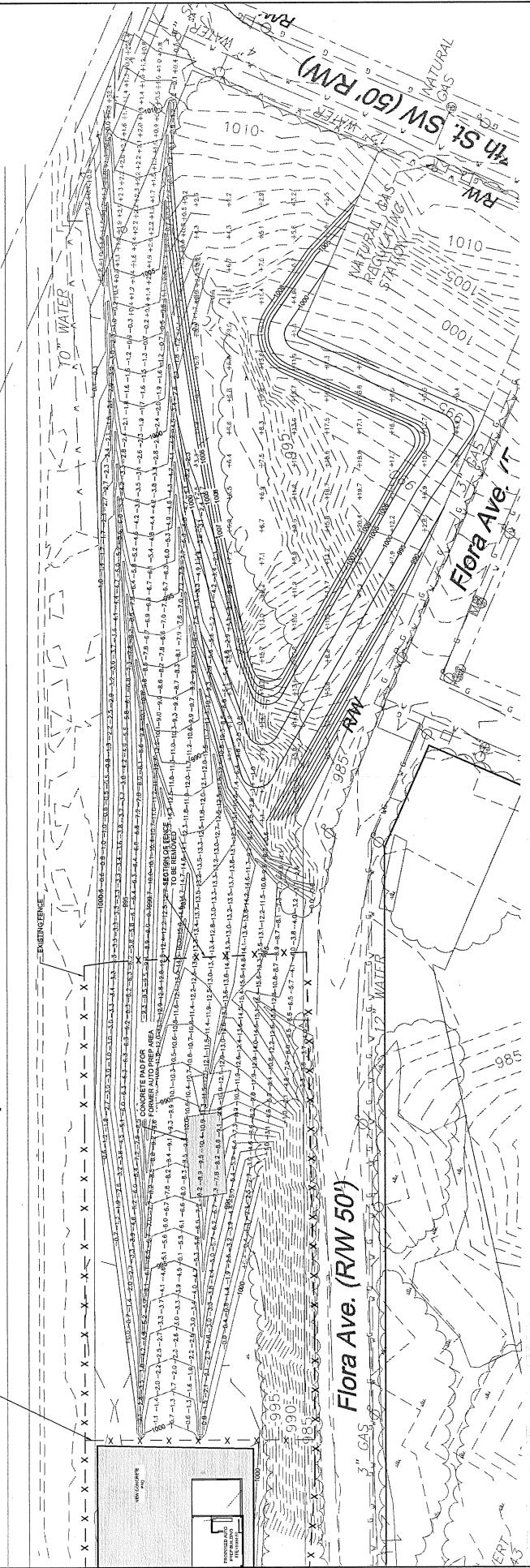
NOTES:

1. THE BASE MAP WAS DRAWN FROM Aerial TO CAD DRAWING NAME: PB-A10762.DWG PROVIDED BY THE OWNER.
2. THE PURPOSE OF THIS WORKSHEET IS TO ESTIMATE THE VOLUME AVAILABLE BETWEEN FLORA AVENUE AND WILBERT ROAD FOR CONSTRUCTION OF THE ROADWAY. THIS SHEET DOES NOT TAKE INTO ACCOUNT FOR SETBACKS, DRAINS, INFRASTRUCTURE, OR PRE-EXISTING FEATURES. THIS WORKSHEET WAS PREPARED TO SUPPORT AN EVALUATION OF POTENTIAL SOIL ACCESS, THIS WORKSHEET WAS NOT PREPARED TO SUPPORT A DESIGN FOR CONNECTOR ROAD, AND IS NOT INTENDED FOR USE AS A DESIGN OR CONSTRUCTION DRAWING.
3. THE LOCATION OF THE EASING PERCESSIONS IS BASED ON AN AERIAL PHOTOGRAPH DATED MAY 21, 2012, BARING ERODEABLE EARTH.

Wilbert Rd. (60' RW)

CSX Transportation Inc. Railroad

PROPOSED FENCE
AND SLIDING STATE



LEGEND:

— — — — —	EXISTING 2 FOOT ELEVATION/CONTOUR
— — — — —	EXISTING 10 FOOT ELEVATION/CONTOUR
— — — — —	PROPOSED 2 FOOT ELEVATION/CONTOUR
— — — — —	PROPOSED 10 FOOT ELEVATION/CONTOUR
— X — X — X —	EXISTING FENCE
— — — — —	LOCATION AND DEPTH OF CUT
— — — — —	LOCATION AND DEPTH OF FILL

NOT FOR CONSTRUCTION

VOLUME WORKSHEET SUMMARY

Site Name:	Volume Surface:	Undulated	Cut	Fill	Net	Method
Site 1	Pile-East Volume Stockpile Base	Pile-East	13675	13671 (F)	TIN	

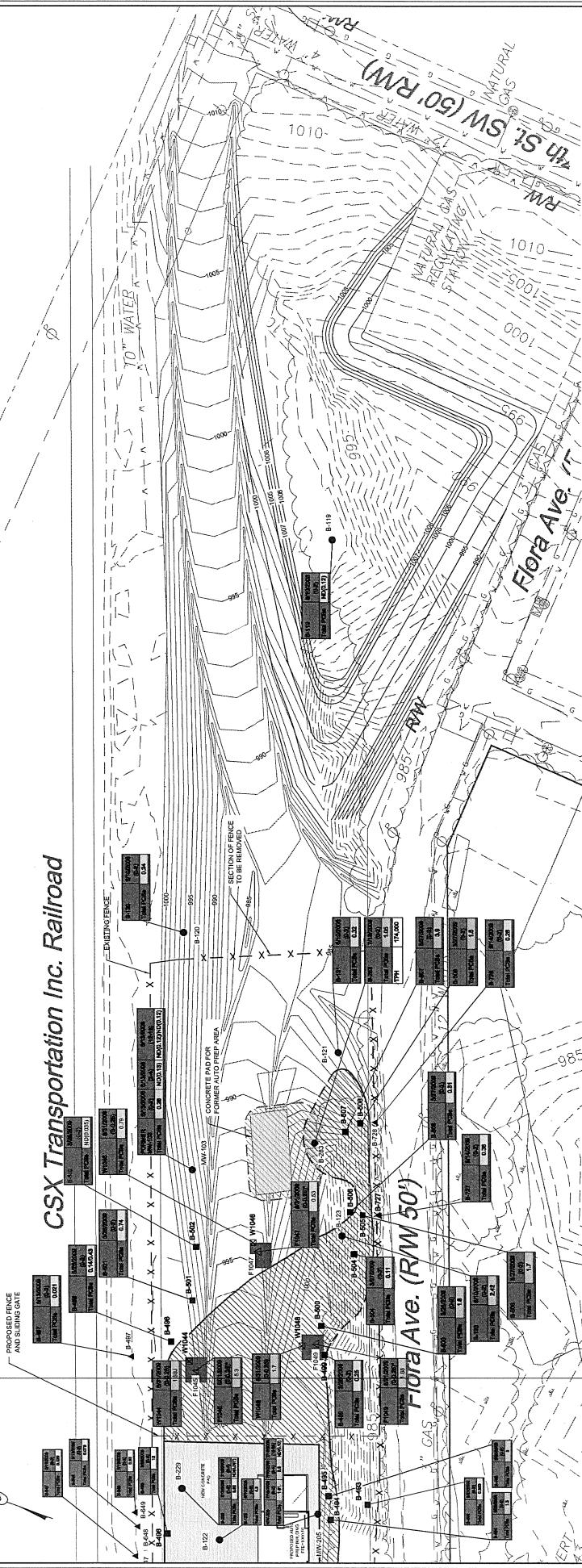
CONNECTOR ROAD SOILS MANAGEMENT		PROJECT NUMBER:
TSB METALS RECYCLING		2927.01
AKRON, OHIO		
CUT AND FILL AMOUNTS		SHEET NUMBER: 2 OF 4

SANBORN || HEAD

GRAPHICAL SCALE	30'	20'	10'
15'	0'		

Willbenth Rd. (60' R/W)

CSX Transportation Inc. Railroad



DRAWN BY: T. REED, DOMBROWSKY
DESIGNED BY: T. REED
REVIEWED BY: P. GALLAGHER
PROJECT MGR: P. GALLAGHER
PIC: P. GALLAGHER
DATE: JULY 2012

SAMPLE LOCATION
SAMPLE DATE
TIME PERIOD
TEST TYPE
PARTICLE SIZE

TOTAL PCB CONCENTRATION

TPH CONCENTRATION IN MILLIGRAMS PER KILOGRAM (mg/kg)
Elev. up to 10' from PCB
Elev. up to 25' from PCB
Elev. up to 50' from PCB

APPROXIMATE LOCATION OF PCB CONCENTRATIONS IN UNPAVED AREAS
CHARTERMAN & ASSOCIATES INC. CONDUCTED A SURVEY OF THE AREA OUTSIDE OF THE PROPOSED FENCE. DASHED INDICATES THE HORIZONTAL DISTRIBUTION IS UNKNOWN.
POTENTIAL AREA WHERE PETROLEUM TAKED AND MOVED WAS IDENTIFIED DURING SAMPLING PHASE IN EARLY AUGUST 2008. DASHED INDICATES THE HORIZONTAL DISTRIBUTOR IS UNKNOWN.

APPROXIMATE LOCATION OF SOIL REPLACEMENT AREA FOR ORIGINAL PCB CLEANUP IN 2008

SANBORN HEAD

GRAPHICAL SCALE	30'	30'	60'
NO.	DATE	DESCRIPTION	BY

PROJECT NUMBER	2027.01
SHEET NUMBER	3 OF 4
HISTORICAL CONCENTRATIONS OF PCBs IN SOIL SAMPLES	

NOT FOR CONSTRUCTION

